

NICHOLAS A. TRUTANICH  
United States Attorney  
District of Nevada  
Nevada Bar Number 13644  
ALLISON REESE  
Nevada Bar Number 13977  
Assistant United States Attorney  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
Email: [allison.reese@usdoj.gov](mailto:allison.reese@usdoj.gov)  
*Attorneys for the United States of America*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
GRISELDA NEGRETE ZARATE,  
  
Defendant.

Case No.: 2:19-cr-00152-JAD-NJK

**STIPULATION FOR EXTENSION  
OF TIME  
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United States of America, and Todd Leventhal, counsel for Defendant GRISELDA NEGRETE ZARATE, that the date for the Government to file a response to the Defendant's Motion to Dismiss (ECF No. 37) be extended for three days, specifically to **July 26, 2019**.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on July 9, 2019. *See* ECF No. 37. The Government's response deadline is presently July 23, 2019.
2. Counsel for the Government is in need of additional time to conduct additional investigation and research to adequately respond to the Defendant's motion.

1           3.     The additional time requested herein is not sought for purposes of delay, but to  
2                 allow counsel for the Government time to adequately respond to the Defendant's  
3                 motion.

4           4.     Additionally, denial of this request for continuance could result in a miscarriage of  
5                 justice.

6           5.     This is the first stipulation filed herein to continue the Government's response  
7                 deadline.

8     DATED: July 22, 2019

9     Respectfully submitted,

10     NICHOLAS A. TRUTANICH  
11     United States Attorney

12                 /s/ Allison Reese

13     \_\_\_\_\_  
14     ALLISON REESE  
15     Assistant United States Attorney

                       /s/ Todd Leventhal

                       \_\_\_\_\_  
16     TODD LEVENTHAL  
17     Counsel for Defendant

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 GRISELDA NEGRETE ZARATE,

7 Defendant.  
8

Case No.: 2:19-cr-00152-JAD-NJK

**FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER**

9 **FINDINGS OF FACT**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
11 Court finds that:

- 12 1. The Defendant's Motion was filed and served on July 9, 2019. *See* ECF No. 37.  
13 The Government's response deadline is presently July 23, 2019.
- 14 2. Counsel for the Government is in need of additional time to conduct further  
15 investigation and research to adequately respond to the Defendant's motion.
- 16 3. The additional time requested herein is not sought for purposes of delay, but to  
17 allow counsel for the Government time to adequately respond to the Defendant's  
18 motion.
- 19 4. Additionally, denial of this request for continuance could result in a miscarriage of  
20 justice.
- 21 5. This is the first stipulation filed herein to continue the Government's response  
22 deadline.

23 For all of the above-stated reasons, the ends of justice would best be served by a  
24 continuance of the Government's response deadline.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24

**ORDER**

DATED this 22nd day of July, 2019.

2